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WRITER'S DIRECT DIAL NUMBER
902-5275

March 24, 1988

VIA MESSENGER

Ms. Susan Swales (5 HE-12)
United States Environmental Protection Agency
Region V
Waste Management Division -
CERCLA Enforcement Section
230 S. Dearborn Street
Chicago, Illinois 60604

Re: 9th Avenue Dump, Gary Indiana -
U.S. Scrap, Chicago, Illinois

Dear Ms. Swales:

We represent Hannah Marine and have received your notice of potential liability and request for information letter, dated March 9, 1988. Initially, I note that your letter to Hannah Marine was improperly addressed. The address for Hannah Marine is Route 83 and Archer Avenue, Lemont, Illinois, 60439, and not 361 S. Frontage Road, Burr Ridge, Illinois, which appears on your letter. Consequently, the document was not received by our client until March 21, 1988. In any event, any future correspondence or telephone calls should be directed to me.

Hannah Marine intends to fully respond to USEPA's request for a statement about its willingness to perform or finance the remedial activities pertaining to the U.S. Scrap and 9th Avenue Dump sites and will also provide whatever salient information responsive to the 104 request for information it possesses or is able to locate. But it needs additional time in order to fully and meaningfully do so.

The additional time will allow Hannah Marine to assess and investigate its responsibility, if any, for the two identified sites and further provide it with the opportunity to gather any documentary evidence it may possess or be able to obtain. In light of the time period identified (1965 to 1977), locating significant documents, if they exist, will obviously be no simple task. Accordingly, Hannah Marine respectfully requests that it be allowed until no later than April 25, 1988, to provide USEPA with a statement about its willingness to perform or finance the

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MAR 25 1988

U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT SECTION

US EPA RECORDS CENTER REGION 5



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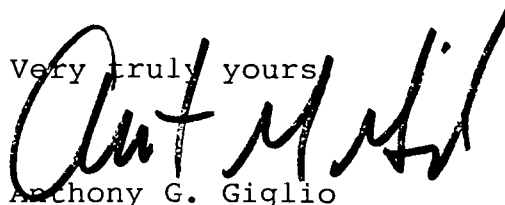
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Page 2

remedial activities described in your letter and to respond to your 104 request for information. Hannah Marine makes this request not for the purpose of delay, but in order to make a diligent and material review and search for information.

Obviously, if I can answer any questions or if you have any comments, please call me.

Very truly yours,

A handwritten signature in black ink, appearing to read "Anthony G. Giglio". The signature is stylized with a large initial "A" and a long, sweeping horizontal stroke at the end.

Anthony G. Giglio

AGG:lp

cc: Edward Kowalski - USEPA Office
of Regional Counsel

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United States Environmental Protection
Agency - Region V
Waste Management Division -
CERCLA Enforcement Section
230 S. Dearborn
Chicago, IL 60604

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<p>3. Article Addressed to:</p> <p align="center">HANNAH MARINE 361 S. FRONTAGE ROAD BURR RIDGE, IL</p>	<p>4. Article Number D759199589</p> <p>Type of Service:</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail</p> <p>Always obtain signature of addressee or agent and DATE DELIVERED.</p>
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<p>7. Date of Delivery 3-14 <i>D. L. Miller</i></p>	